

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

1650 Arch Street Philadelphia, Pennsylvania 19103-2029

August 1, 2007

Mr. Patrick McLaughlin
Fort Belvoir Directorate of Public Works
Environmental and Natural Resources Division
Building 1442
9430 Jackson Loop
Fort Belvoir, Virginia 22060

Re: Final Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia (CEQ #20070280)

Dear Mr. McLaughlin:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement for the Implementation of 2005 Base Realignment and Closure (BRAC) Recommendations and Related Army Actions at Fort Belvoir, Virginia. EPA has determined that the U.S. Department of the Army has adequately addressed its comments within the FEIS, and has no objections to the proposed project.

EPA commends the Army for its responses to comments and for providing the additional information requested. Although EPA's comments were adequately addressed, there is still concern that the elimination of the "Environmentally Sensitive" land use category would be detrimental to the protection of areas not labeled as a "high-value resource" but are nonetheless environmentally sensitive.

EPA understands that, "In addition to regulatory protection requirements, environmentally sensitive areas are protected by mitigations identified in environmental assessments and in the 1991 BRAC ROD." The FEIS also states that "In addition, the master planning process is also expected to result in the establishment of environmental constraints." It is suggested that if other documentation supports protection of environmentally sensitive areas, then it would be beneficial for the Land Use Plan to be consistent with other plans to provide continuity and commitment on the part of the Army. This would also help to alleviate any misrepresentation or discrepancy in the future as new project plans are proposed.

The Army was thorough in outlining best management practices and mitigation measures, where feasible, within the FEIS. However, even with these measures long-term moderate adverse effects on vegetation, wildlife, sensitive species, and sensitive natural areas would be expected. To ensure protection of these natural resources, the "Environmentally Sensitive" land use category would give these areas visibility, thus signifying the importance and necessity of preservation.

Thank you for providing EPA with the opportunity to review this project. If you need assistance in the future, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

William Arguto

NEPA Team Leader

Office of Environmental Programs